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November 27, 2018

Honorable Cathy Waldor, U.S.  
Magistrate Judge  
United States District Court  
District of New Jersey Newark  
MLK Federal Building & Courthouse, Room 4040  
50 Walnut Street  
Newark, NJ 07102

Re: DS-Concept Trade Invest LLC v. Atalanta Corporation, et al.  
Civil Action No. 2:16-cv-00429 (SRC)(CLW)

Dear Judge Waldor:

My office represents non-party, Great American Insurance Company ("GAIC"). GAIC was served with a subpoena to produce documents, et al. by plaintiff's counsel, Richard Simon, Esq. of Mandelbaum Salsburg, P.C.

Attached to this letter is the subpoena.

Thereafter, GAIC was notified by its insured, the defendant Atalanta Corporation ("Atalanta") by its counsel Steven Aquino, Esq., not to produce

**Franzblau Dratch, P.C.**  
A Professional Corporation

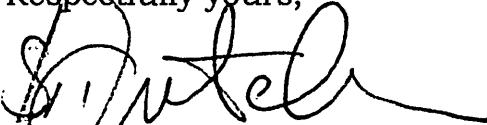
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certain documents. Furthermore, on several occasions, plaintiff's counsel informed my office that it was going to be filing a protective order with regard to the plaintiff's subpoena.

GAIC is prepared to turn over to the Court the disputed documents so that a determination can be made if they are discoverable. Mr. Simon has been more than patient with regard to compliance with the plaintiff's subpoena. If the Court would prefer the filing of a formal motion, I will comply but it is respectfully submitted that GAIC does not have a "dog in this fight" and requests the Court's guidance with regard to the production of documents.

May I please hear from Chambers with regard to this request.

Respectfully yours,

A handwritten signature in black ink, appearing to read "S. Dratch", written over a horizontal line.

STEPHEN N. DRATCH

SND/dp  
Enclosure

cc: Richard Simon, Esq.  
Zachary G. Newman, Esq.  
Steven Aquino, Esq. (via email - [SAquino@hahnhausen.com](mailto:SAquino@hahnhausen.com))